

I appreciate this opportunity to respond to the FCC notice of proposed rule making that would, if adopted, require broadcasters to record and retain up to all programming. I appreciate and share the Commission's interest in protecting citizens from experiencing any obscene, indecent, or profane language by broadcasters. There is no place for this kind of content. However I feel the proposal, as outlined, would increase the cost of operations without a measurable benefit. We estimate the cost of recording and retention per month per program stream would be \$300. If adopted, we would use VHS recorders as the cost of this technology, we believe, is now cheaper than any other recording format including that of non-linear. Because all forms of programming are already recorded either at the station level or by our suppliers there is no need to require this additional level of recording. Therefore I strongly suggest that the Commission not adopt a recording retention requirement. In my 28 years as manager of this station not once have we received a complaint regarding obscene, indecent or profane broadcasting. I suggest you make it clear to all broadcasters, as you did in the CBS Super Bowl unfortunate incident, that the inclusion of obscene, indecent or profane content will not be tolerated. I know of no television broadcaster that would consider violating these important prohibitions. Respectfully submitted, Al Bramstedt General Manager KTUU-TV